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UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

In Re Bard IVC Filters Products
Liability Litigation

No. MD-15-02641-PHX-DGC

**JOINT MOTION TO EXTEND MOTION
FOR SUMMARY JUDGMENT
RESPONSE AND REPLY PAGE LIMITS
AND DEADLINES**

The parties, through their attorneys undersigned, respectfully request that the Court
extend various deadlines and page numbers relating to Motion for Summary Judgment

1 response and reply brief page limits. The parties certify that they have conferred about the
2 matters set forth below and hereby jointly agree to the following:

3 1. Motion for Summary Judgment Responses and Replies. The parties agree
4 that Plaintiffs' responses to Motions for Summary Judgment may be filed on Monday,
5 October 2, 2017 (extended from Friday, September 29, 2017) and include seven additional
6 pages for a total of 24 pages (the *Hyde* response shall be permitted up to 28 pages given
7 the required choice of law analysis and the *Hyde*). The parties may have an additional
8 seven pages for a total of 20 pages for their replies in support of Motions for Summary
9 Judgment (Defendants' reply regarding the *Hyde* motion shall be increased to 22 pages)
10 and said replies shall be due on Wednesday, October 25, 2017 (extended from Friday,
11 October 20, 2017). These modifications affect the page limits but not the due dates for
12 the previously-extended *Booker* motion for summary judgment response and reply briefs.

13 The parties believe that good cause exists for the requested extension of page limits
14 and filing deadlines given the need to coordinate multiple filings amongst various offices,
15 among other logistical issues that arose beyond the parties' control and respectfully
16 request that the Court approve the requested extensions.

17 Respectfully submitted this 27th day of September 2017.

18 GALLAGHER & KENNEDY, P.A.

NELSON MULLINS RILEY &
19 SCARBOROUGH LLP

20 By: /s/ Mark S. O'Connor

By: /s/ Matthew B. Lerner

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CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of September 2017, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/ Deborah Yanazzo